1 2 3 4 UNITED STATES DISTRICT COURT 5 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 6 ELIZABETH DE COSTER, et al., on behalf of No. 2:21-cv-00693-JHC 7 themselves and all other similarly situated, STIPULATED MOTION AND 8 Plaintiffs, ORDER REGARDING SEALING OF SUPPLEMENTAL MOTION TO 9 **COMPEL BRIEFING** v. 10 AMAZON.COM, INC., a Delaware corporation, 11 Defendant. 12 DEBORAH FRAME-WILSON, et al., on behalf No. 2:20-cv-00424-JHC 13 of themselves and all other similarly situated, 14 Plaintiffs, 15 v. 16 AMAZON.COM, INC., a Delaware corporation, 17 Defendant. 18 No. 2:22-cv-00965-JHC CHRISTOPHER BROWN, et al., on behalf of 19 themselves and all others similarly situated, 20 Plaintiffs, 21 v. 22 AMAZON.COM, INC., a Delaware corporation, 23 Defendant. 24 25 26 27 STIP. MOT. & ORDER RE SEALING OF SUPP. MTN. TO COMPEL BRIEFING

(No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC)

The Parties have met and conferred with respect to the upcoming supplemental briefing on Plaintiffs' Motion to Compel, and anticipate that their briefs, declarations, and exhibits will quote from and/or describe in detail a significant amount of information that has been designated as Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon. Accordingly, in order to ensure that such materials are treated appropriately under the applicable protective order, and to reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their respective counsel, hereby stipulate and agree to the following procedure for filing and sealing in connection with the supplemental motion to compel briefing, subject to the Court's approval.

- 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its supplemental brief, declarations, exhibits, and all other evidence and declarations on which that Party relies (collectively, "Supplemental Papers") which contain material designated Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon.
- 2. Within two weeks of the filing of the Parties' Supplemental Papers, pursuant to LCR 5(g), the Parties will meet and confer and, as appropriate, file (1) public versions of their Supplemental Papers, with necessary redactions, and (2) corresponding motion(s) to seal pursuant to LCR 5(g)(3). The Party seeking to maintain material under seal (or under redaction) shall be the movant for purposes of any such motion(s) to seal associated with the Parties' Supplemental Papers.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

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1	DATED December 9, 2024.	Respectfully submitted,
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RE SEALING OF SUPP. MTN. TO COMPEL BRIEFING - 3

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IT IS SO ORDERED.

December 9, 2024

Dated

John H. Chun

United States District Judge

STIP. MOT. & ORDER
RE SEALING OF SUPP. MTN. TO COMPEL BRIEFING - 4
(NO. 2:21-CV-00693-JHC; NO. 2:20-CV-00424-JHC; NO. 2:22-CV-00965-JHC)